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## IN THE UNITED STATES DISTRICT COURT

## FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AUTHORS GUILD, INC., Associational Plaintiff, BETTY MILES, JOSEPH GOULDEN, and JIM BOUTON, on behalf of themselves and all other similarly situated,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 05 CV 8136 (DC)

**ECF Case** 

DECLARATION OF ALBERT N. GRECO IN SUPPORT OF DEFENDANT GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT I, Albert N. Greco, declare as follows:

- I am a Professor of Marketing at Fordham University's School of Business: The
   Gabelli School of Business and the Graduate School of Business Administration.
- 2. I have been retained by Defendant Google Inc. as an expert in this matter to describe the characteristics and practices in the book industry, such as mergers, acquisitions, and reversions, that effect one's ability to locate rights holders for books; the benefits to authors of making it easy for potential readers to find their books; and industry custom and practice pertaining to the sales and marketing of books, and in particular to the practice of allowing potential buyers to search within books.
- 3. My expert report, which was submitted in this matter on May 4, 2102, is attached hereto as Exhibit A. The facts in that report stated on my personal knowledge are true and correct. The report also states truly and correctly my opinions in this matter, based on the facts of which I have personal knowledge and the additional information reflected in the report.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 232012 in New York, New York.

Gha T. S. Albert N. Greco